

Wednesday, December 18, 2002

Gentlemen,

I am writing this in reply to the recent request on 99-325 by Mr. Wells King of Garvey Schubert Barer to have IBOC allowed at night. I am taking this as a user of the standard broadcast band and holder of the GROL to request that this not be allowed.

I live in West Columbia, SC and have read with interest and listened to the tests of the IBOC system during night tests. The interference from the digital sidebands will render the night use of the standard "AM" band next to useless except for the lucky few persons that live WELL within the city grade signals of a broadcast station. When WLW and WOR tested, the interference was noted on the adjacents and when WOR was on it significantly affected WGN, even though WOR's nighttime signal during the testing was not a useable signal for average listening. There was also significant digital noise noted on WLW's signal. When WLW was running IBOC, it made WOR totally unlistenable and nothing could be heard on 690. Simple tests like this are not a true indication of real world implications of what the interference would be like. A true test would be if everyone on 3 NON clear channels were to run IBOC for testing.

In one part of the document it is stated that "computer models and field tests have shown that night time use of the AM IBOC system can in certain instances, lead to intolerable levels of interference"....then elsewhere on page 4 claims "the number of stations which would cause interference is small". This is totally contradictory to the earlier statement.

Even at reduced power level IBOC will play havoc to the standard AM band. There are too many stations on the AM band for this to work. We would have to revert to a pre-NARBA (1941) level of stations from the current of just over 4800 stations, and then most stations local coverage would be severely restricted, especially at night.

This digital system, cannot handle skywave, nor does it tolerate interference well. And in the light that radio manufacturers have seemingly forgotten how to make a reasonably functional radio, or won't try to, IBOC should not be allowed at night.

Thank you for your consideration

Powell E. Way III

PO BOX 280461
Columbia, SC 29228